

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION

LLT MANAGEMENT LLC,

Plaintiff,

v.

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND
DR. JOHN COULTER MADDUX

Defendants.

Civil Action No. 4:24-cv-75

DECLARATION OF DR. JOHN C. MADDUX, MD

Dr. John C. Maddux, MD hereby declares under penalty of perjury as follows:

1. I am over eighteen (18) years of age and have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.
2. I am a board-certified physician in anatomic and clinical pathology as well as hematopathology, and am licensed to practice medicine in the Commonwealth of Virginia. I have published about a dozen articles on hematology or asbestos disease.
3. For more than 30 years, I was a full partner at Peninsula Pathology Associates PC ("Peninsula"). I am now retired, but still affiliated with Peninsula, where I am a part-time employee.
4. Before I retired in 2019, I practiced as a physician for more than 40 years. I routinely saw patients with blood disorders (including acute leukemia), performed biopsies, and interpreted their staging results. Throughout my career, my primary professional responsibilities have related to direct patient care.
5. I have also provided medical-legal consultation services where I have served as an expert witness in asbestos-related litigation and medical malpractice cases. Before I retired in

2019, I estimate that approximately one-half of my professional responsibilities related to patient care in my fields of hematology and hematopathology, approximately one-third of my professional responsibilities related to expert witness services, and approximately one-sixth of my professional responsibilities related to administrative work and other miscellaneous obligations.

6. My expert witness caseload has declined over the last 15 years. Since retiring, I estimate that I spend approximately an average of 20 hours per month providing expert witness services.

7. I co-authored a peer-reviewed article entitled "Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients," which was subsequently published in March 2020 in the American Journal of Industrial Medicine (the "Article").

8. I did not receive compensation from Peninsula or anyone else for my efforts to conduct the study or draft or publish the Article.

9. My sole aim in conducting the study and writing and publishing the Article was to contribute to the scientific literature based on my knowledge and experience. I did not write the Article in order to further my expert witness services, and would never do such a thing. The Article was published after I had retired, at a time when I was not planning on expert witness work being a large part of my life moving forward.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 18, 2025

A handwritten signature in black ink that reads "John C. Maddox, MD". The signature is written in a cursive, flowing style.

Dr. John C. Maddox, M.D.